



PATRICK+COUGHLIN

APPLICATION GRANTED
SO ORDERED

+ Via ECF +

July 11, 2025

7/11/25


John G. Koeltl, U.S.D.J.

Honorable John G. Koeltl, U.S.D.J.
United States District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Oklahoma Firefighters Pension and Ret. Sys. v. Deutsche Bank Aktiengesellschaft, et al.,*
No. 1:23-cv-05095

Dear Judge Koeltl:

Pursuant to Rule VII.A.2 of the Court's Individual Practices, Plaintiff Oklahoma Firefighters Pension and Retirement System ("OKFPRS") moves for leave to file the First Amended Consolidated Class Action Complaint ("FAC") under seal. Plaintiff has filed a redacted version of this document on the public docket.

The Court previously approved sealing of this document in granting the application of Settling Defendants¹ in connection with OKFPRS's motion for leave to amend the complaint. *See* ECF No. 144; *see also* ECF No. 141-1. Now that leave has been granted, OKFPRS is requesting sealing for the same reasons previously endorsed by the Court, namely that the FAC relies on materials designated "Confidential" by Settling Defendants pursuant to the terms of the March 25, 2025 Stipulation and Protective Order Governing the Confidentiality of Cooperation Materials. ECF No. 128. Moreover, the scope of the redactions is identical to what the Court previously approved. *See* ECF No. 138-1.

We are available to discuss any questions the Court may have.

Respectfully submitted,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

/s/ Patrick Coughlin
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FATIMA BRIZUELA
PATRICK J. RODRIGUEZ
DANIEL J. BROCKWELL (admitted *pro hac vice*)

¹ "Settling Defendants" are Defendants Citigroup Global Markets Limited, Citigroup Global Markets Inc., RBC Europe Limited, RBC Capital Markets LLC, HSBC Bank plc, HSBC Securities (USA) Inc., Morgan Stanley & Co International Plc and Morgan Stanley & Co. LLC.

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cc: All Parties of Record via ECF